

EXHIBIT 5



Compressed Transcript of the Testimony of
TOM DREHER, 10/1/09

Case: Dixon-Rollins v. Experian Information Solutions, et al.

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1 different building. To find out who was all tied 2 together. The agreement for collection tells me who the 3 properties are tied to the property management company. 4 We don't wish for anybody to know anything beyond that. 5 So our collectors don't have a reason to know that we're 6 working for ten properties or one.	1 stop using my service. 2 Q I understand that business is always flowing, 3 sir. But could you estimate without guessing how many 4 clients your company has? 5 A No, I could not any longer. 6 Q Okay. Was there a period of time that in 7 your capacity as president you knew how many clients 8 your company had?
7 A What period? 8 Q Let's say this year, how many accounts do you 9 have for collection right now? 10 A Approximately 20 to 25,000. 11 Q Over the course of a year like 2008, last 12 year? 13 A Like -- like a twelve-month period? 14 Q A 12-month period such as 2008 last year, how 15 many total accounts would your company have that it's 16 working up in some fashion or another to try to collect 17 money on? 18 A Twenty to 24,000. 19 Q Am I correct, sir, that your company works on 20 a contingency fee basis? 21 A Yes.	10 A I'm unsure. 11 Q Did you ever know? 12 A On an accurate basis, no. 13 Q Okay. How many clients did your firm turn 14 down within this year 2009, we're now in October, 15 because they did not provide sufficient information to 16 back up the debt that they were sending to you for 17 collection? 18 A I don't know. 19 Q Anybody? 20 A Sure. 21 Q Anybody come to mind? Could you tell me one? 22 A No, they're in actual banker boxes sitting 23 there waiting for someone to cooperate and give us the 24 back-up information. Without that we won't work for 25 them. Q I'm not asking about the process where you're
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1 Q In other words, your company doesn't get paid 2 unless it actually collects money. Correct? 3 A Correct. 4 Q So if we take an example Chancellor they 5 place ten accounts with you, they won't pay you anything 6 unless you actually collect money on those accounts. 7 Correct? 8 A Yes. 9 Q What percentage do you get to keep if you 10 collect money? 11 A Approximately 30 to 37 percent. 12 Q Has ACCB ever turned down a client because 13 they just will not provide enough information about the 14 debts that are allegedly owed? 15 A Yes, if you can't back up. 16 Q How many total clients does ACCB presently 17 have? 18 A I'm unsure. 19 Q Would you say over 10,000? 20 A Certainly, no. 21 Q Would you say its over 5,000? 22 A I'm unsure. Because there's -- clients are 23 coming. Clients are going. As I said, in the apartment 24 business a lot of my business comes from property 25 management companies and their contract ends and they	1 waiting for the back up. I'm asking about a client that 2 you said we're not no longer going to do business with 3 you, we won't collect for you because you don't give us 4 enough information to know that a debt is actually owed. 5 A I'm unsure. 6 Q Okay. Could you remember the name of any? 7 MR. PERR: Do you need paper? 8 THE WITNESS: I'm just trying to calculate 9 something. I can't even think. My mind is a 10 blank. I'm unsure. BY MR. SOUMILAS: Q Well, if you think of one, would you let me know? A Okay. Q Does your company as a matter of its routine business report collection accounts to the national credit bureaus Equifax, Experian and Trans Union? A Yes. Q Does it report to all three? A Yes. Q All accounts? A There are some parameters that would -- would warrant not doing that. And that changes by the credit reporting industry about 75 to \$100 account, cannot be any lower than that, they won't coll -- they won't put

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1 the account in a credit bureau file. There's a number 2 of rules, I can't tell you off the top of my head, that 3 the credit reporting company has. 4 Q Does your company ask permission of its 5 clients before it places accounts on -- with the 6 national credit bureaus? 7 A Yes. 8 Q And is that permission memorialized some 9 place? 10 A Yes. 11 Q Where would that be memorialized? 12 A Agreement for collection. 13 Q Okay. Do all the agreements for collection 14 ask for permission to have the accounts placed with the 15 national credit bureaus? 16 A Yes. 17 Q Why would your company want to place 18 collection accounts with the national credit bureaus? 19 A There's too many reasons to list. Probably 20 the biggest is that the change in circumstance within 21 the consumer with time passing that they may be able to 22 take responsibility of a bill two years later they 23 couldn't do at the time. 24 Q Would you agree with me that once an account 25 is placed with a credit bureau, your company could look	1 account on a credit bureau file with the national credit 2 bureaus is a form of collection activity? 3 MR. PERR: I'm going to object to the form of 4 the question to the extent that it's asking for a 5 legal opinion. 6 THE WITNESS: I don't have an answer, I -- 7 BY MR. SOUMILAS: 8 Q Does your company do it as a matter of 9 practice in aid of collecting on that debt? 10 A That's one aspect, yes. 11 Q And would you agree with me that whenever one 12 of your accounts is placed with the national credit 13 bureaus, it's always a collection account. Correct? 14 A Yes. 15 Q You understand that to be a derogatory 16 account. Correct? 17 A When it's placed in a collection bureau file 18 would be derogatory, yes. 19 Q Consumers who have accounts with your company 20 they don't consider those to be good accounts. Those 21 are derogatory accounts? You would agree with that 22 statement? 23 A Who feels that way? 24 Q Let's strike the who feels part. 25 Collection accounts with ACCB are never
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1 at that consumer's credit report to see how their 2 circumstances might change? 3 A No. You have to pay a fee for it. 4 Q After you pay the fee, do you get to look at 5 the credit report? 6 A No, I don't think you understand. There's no 7 cost to place the account in the credit file. For me to 8 do any activity, like any other credit grantor, I have 9 to pay something for that. 10 Q Okay. I'm sorry. I want to be clear. You 11 told me that as circumstances change with a debtor that 12 might improve your company's chances of collecting a 13 debt. Correct? 14 A Yes. 15 Q And do you use the credit bureaus as a source 16 of learning whether circumstances are changing with a 17 debtor? 18 A Yes, but normally it's more the consumer has 19 the change and contacts us because the account is on the 20 credit profile. 21 Q Oh, I see. So the -- you place the account 22 on the credit bureau file to urge the consumer to 23 contact you about the debt. Correct? 24 A Yes. 25 Q Would you agree with me that placing an	1 positive credit accounts. They are always derogatory 2 accounts. Correct? 3 A I'm not in the extension of credit business, 4 so I can't be an expert as to how someone sees it 5 outside my operation. 6 Q Well, I know you're not an expert, sir. But 7 as the president of a collection company, is it your 8 understanding that these collection accounts that are 9 placed with the national credit bureaus are accounts 10 that are derogatory in nature or accounts that actually 11 help the consumer's credit standing? 12 MR. PERR: I object to the form of the 13 question. 14 BY MR. SOUMILAS: 15 Q Could you answer that? 16 A I can't. I'm not an expert. I can't tell 17 you. 18 Q I'm not asking you if you're an expert. I'm 19 just asking you as the president of your company do you 20 have any judgment on that? Do you think the accounts 21 are derogatory or could they be helpful? If you don't 22 know, you don't know? 23 A I call it a collection account. I don't call 24 it a derogatory account. 25 Q Do you think that a collection account is an

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1 back to the credit bureaus through the e-OSCAR system as 2 to what should be done with that account? 3 A Yes. 4 Q And am I correct that the e-OSCAR system 5 allows ACCB to delete an account that should not be 6 reporting as to that consumer? 7 A To my understanding, yes. 8 Q Does the e-OSCAR system also allow your 9 company to verify that an account is accurate and should 10 stay the way it is? 11 A To my understanding, yes. 12 Q And does the e-OSCAR system also allow you to 13 modify an account if some changes need to be made? 14 A It's my understanding, yes. 15 Q You've heard the term verified as reported 16 within your company? 17 A Yes. 18 Q Does that mean that the account is accurate 19 in all respects and that it should stay on just the way 20 it is? 21 A To the best of my knowledge, yes. 22 Q All right. And how long has Dawn Eddy been 23 responsible for handling these type of e-OSCAR disputes? 24 A She's worked for us for approximately one 25 year.	1 Q Okay. Does Ms. Eddy do the credit bureau 2 investigations through the e-OSCAR system right at her 3 receptionist's desk? 4 A To the best of my knowledge. 5 Q Okay. Nobody else at your company over the 6 last year or so has responsibility for doing credit 7 bureau disputes through e-OSCAR. Correct? 8 A Either her or Tina. 9 Q Tina you told me has some different job. Correct? 10 A None of these are full-time 40-hour work week 11 type responsibilities. 12 Q All right. We'll get to that in a moment. 13 How many hours a week does Ms. Eddy or Eddy, 14 excuse me, work for your company? 15 A Talking about total number of hours worked? 16 Q Per week, yes. 17 A 40. 18 Q How many -- so she is a full-time employee? 19 A Yes. 20 Q How many hours during a 40-hour work week 21 would she devote to handling credit bureau disputes as 22 opposed to her receptionist duties? 23 A I'm unsure. 24 Q How many e-OSCAR credit bureau disputes does
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1 Q How long has she been responsible for 2 handling the e-OSCAR credit bureau disputes? 3 A I'm unsure. 4 Q Was it -- has it been more than a year or 5 less -- couldn't be more than a year, she's only been 6 with you for a year. Has it been the whole year or just 7 recently? 8 A I'm unsure. 9 Q Okay. But do you know when she joined the 10 company? 11 A I believe it was either September or October, 12 2008. 13 Q Is she the receptionist? 14 A Yes. 15 Q Okay. What duties does she have as a 16 receptionist? Answering the phones, opening the mail, 17 those type of basic receptionist duties? 18 A Yes. 19 Q When somebody comes to visit to set up the 20 appointment, et cetera? 21 A That's not done normally. 22 Q Okay. Is there any other receptionist at 23 your company other than Ms. Eddy? 24 A No. We have a backup system with various 25 people on the floor who pick up the calls.	1 your company receive in any given week? 2 A I'm unsure. 3 Q You use the term unsure. Do you have an 4 approximation without guessing as to how many -- 5 A No, I do not. 6 MR. PERR: Let him finish. 7 BY MR. SOUMILAS: 8 Q As the president of ACCB did you ever know 9 how many credit bureau disputes the company receives? 10 A No. 11 Q Is it your testimony, sir, that it is one 12 person's job to deal with the e-OSCAR credit bureau 13 disputes? 14 A No. 15 Q You told me that Ms. Eddy is the only person 16 that deals with the e-OSCAR disputes, did you not, 17 presently? 18 A She and Tina share that responsibility. 19 Q Okay. So Tina also does e-OSCAR? 20 A Yes. 21 Q Yes? 22 A Yes, all my employees do various tasks and 23 that's just some of the tasks, yes. 24 Q Okay. Do other employees in addition to Dawn 25 Eddy and Tina Votava also deal with e-OSCAR disputes?

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1	Q Oh.	1	A Dawn Eddy.
2	A I'm not aware. I'm not knowledgeable, no.	2	Q I apologize. Dawn Eddy. Did she have any
3	Q Okay.	3	background in investigations of any sort including
4	A I've not asked the question before.	4	credit investigations?
5	Q Okay. Have you ever had any employee bring	5	A Not that I'm aware of.
6	to your attention personally that the flow of credit	6	Q Okay. In those circumstances where your
7	bureau disputes is so high that there is more help	7	company decides on a credit bureau dispute to delete an
8	needed to deal with those disputes?	8	account, sir, you told me there was some circumstances
9	A I'm not aware of any problem at all.	9	where the company says we've got to delete this account.
10	Q All right. No employee in your company has	10	Correct?
11	ever complained that the work flow as far as credit	11	A Yes.
12	bureau disputes is concerned is too much?	12	Q So let's say that that's either the situation
13	A No.	13	where it's clear that, you know, the consumer's dispute
14	Q That they don't have enough time to deal with	14	is legitimate and the consumer doesn't owe money or the
15	those disputes?	15	situation where it's too close of a call and your
16	A No.	16	company gives the benefit to the consumer. Let's talk
17	Q That they're not sufficiently trained to deal	17	about that situation. Okay?
18	with those type of investigations?	18	When the account is deleted by ACCB at one of
19	A Not to my knowledge.	19	the national bureaus, does it delete it at all three of
20	Q No problem at all?	20	the bureaus at the same time?
21	A Not to my knowledge.	21	A Each month updated filings are reported to
22	Q Nobody's brought the -- a problem to the	22	any and all three credit bureaus.
23	company's attention. Correct?	23	Q My question is when your company makes a
24	A Nothing's come to me.	24	decision after an investigation to delete an account,
25	Q And nothing has come to your attention	25	does it delete it with one bureau or does it delete it
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1	personally?	1	with all three bureaus?
2	A No.	2	A All three bureaus.
3	Q That's your testimony?	3	Q Is it supposed to delete an account with all
4	A No.	4	three bureaus at the same time?
5	Q Okay. In the last three years, let's say,	5	A It's our intent, yes.
6	have there been more than two people at your company who	6	Q Is it the practice and the policy of your
7	would have any degree of responsibility for	7	company that if it's to be deleted with one bureau, it
8	investigating credit bureau disputes?	8	should be deleted with all three?
9	A Possibly three, but never more than that.	9	A Once the work card is updated, whatever that
10	Q Okay. How long has Tina Votava been with	10	discipline is, that's how it's reported.
11	your company?	11	Q Would you agree with me, sir, that if it's
12	A Approximately one year.	12	deleted with one bureau, it should be deleted with all
13	Q Do you know what she did before then?	13	three?
14	A I can recall who they were 'cause I checked	14	A Certainly.
15	references out, but I don't remember all the details.	15	Q And that is what the practice is supposed to
16	no.	16	be at your company?
17	Q And do you know whether she had any training	17	A Yes.
18	in conducting credit bureau investigations?	18	Q There is no reason to delete it with one
19	A She had no background in credit at all.	19	bureau and leave it on the other two. Correct?
20	Q And any background in conducting	20	A Certainly not.
21	investigations for any other type of matter other than	21	Q Okay.
22	credit disputes?	22	MR. CRUZ: Two minutes.
23	A No.	23	BY MR. SOUMILAS:
24	Q And how about Tina Eddy did she have any back	24	Q Does your company have a website?
25	ground --	25	A Yes.

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1	A I don't know the time of how long that's 2 kept. I only can tell you that I know it's not 3 something that stays in any record on the system for a 4 very long period of time. They're supposed to transfer 5 the information on to the work card.	1 card. 2 Q Okay. Now, if you're saying Tina could have 3 used Outlook or some other communications, but you don't 4 know of any record retention policy for those notes that 5 would have been taken in connection with an investigation. Correct?
6	Q Do you know, sir, how long it stays on what 7 you call the Outlook system or the Outlook package?	6 A That's correct. 7 Q You don't know that the notes don't still 8 exist today? You just don't know what the record 9 retention policy is?
10	A No, I don't. 11 Q Does it stay there at least a day? 12 A I'm not sure. 13 Q How do we know what an investigator like Tina 14 did if she doesn't keep any records of what she did? 15 A It's on the work card. 16 Q All right. Are you saying that everything 17 that an investigator would have done in a credit bureau 18 dispute is supposed to be marked on a work card? 19 A Supposed to be, yes. 20 Q So even if we assume that there was a 21 separate record in Outlook that had the names of 22 somebody she called or some notes that she took, whatever that she did, that data is supposed to be entered and put into the work card. Correct?	10 A I don't know, but I know it's short. I just have not recalled what it is anymore. 11 Q Okay. So you do know it's short? 12 A Very short. 13 Q Oh, very short. Okay. Do you know why it's 14 very short, why aren't those records kept? 15 A I don't have a good answer. Because I'm not 16 sure it's important to retain that. It's something you do and then you automatically scan the document to prove it and/or you make the note in the credit bureau file -- I mean, the work card, the conclusion, that's it.
23	A Yes, in a perfect world everything is 24 transferred on to the work card and that's it. 25 Q According to the policies and practices of	17 Q So if everything is supposed to be in the work card all Eddy, there wouldn't be anything missing? 18 A There should not be, no. 19 Q All right. Now, we had also before the break
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1	your company whatever is done in connection with an 2 investigation into a credit bureau dispute is supposed 3 to be memorialized on the work card?	1 mentioned your company's website. I would like to show 2 you a few pages from that website that we'll mark 3 as Dreher - Dreher - let the court reporter please mark it Dreher 5. 4 (Thereupon Exhibit 5 was marked.) 5 BY MR. SOUMILAS: 6 Q And those - what I put in front of you as 7 Dreher 5, sir, is only five pages of a printout. It's 8 not - I'm not representing that it's your entire 9 website. Do you recognize these five pages as your 10 company's website? 11 A Yes, it does appear that way, yes. 12 Q Would you agree with me that the first page 13 of Dreher 5 is your homepage. So when somebody finds 14 the company, that's what the screen looks like at the 15 beginning? 16 A Yes. 17 Q And like most websites, you could click on 18 different links and see different pages. Correct? 19 A Yes. 20 Q Have you ever seen that right on the first 21 page of your website it says that the - that the 22 company has been in business for 45 years? 23 A Established in 1955, yes. 24 Q The company was established in 1955, you

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<p>1 report to Chancellor about the status of its account. 2 A Unless I researched it, I do not have an 3 answer. I do not know. 4 Q Okay. Do you have any knowledge that 5 Chancellor Properties was calling up or writing to ACCB 6 every month inquiring about the status of the 7 Dixon-Rollins account? 8 A I would have no way of knowing. 9 Q Is there any evidence that Chancellor 10 Properties was knocking on the door saying where is our 11 money for this Dixon-Rollins account, would you give us 12 an update? 13 MR. PERR: You mean other than the evidence 14 that's already in the record? 15 MR. SOUMILAS: No. No. There is no evidence 16 in the record that they ever asked where is our 17 money. 18 BY MR. SOUMILAS: 19 Q Is there any evidence that Chancellor 20 Properties inquired and said are we ever going to get 21 paid on this account, give us a status update? 22 A I'm not aware of anything. 23 Q Okay. Let's go to the final page of Dreher 5 24 which is a part of your website that has a sales 25 presentation preserving your reputation and a third</p>	<p>1 the Federal Trade Commission that you are always in 2 complete compliance with state and federal laws 3 including the FDCPA and FCRA? 4 A No. 5 Q Did you ever receive an opinion from an 6 attorney or a law firm saying that you are always in 7 complete compliance with laws including the FCRA and 8 FDCPA? 9 A No. 10 Q Okay. You told me that in the cases where 11 you were sued under the FCRA and FDCPA you are not aware 12 that your company ever won any of those cases. Correct? 13 A No, no cases went to judgment ever. 14 Q Okay. Your company settled all the cases? 15 A I classify as -- as nuisance lawsuits that 16 are generating a thousand, \$2,000. 17 Q Okay. So you classified the lawsuits as a 18 nuisance to your company? 19 A Yes. 20 Q Not legitimate? 21 A That's correct, yes. 22 Q But you did not get any ruling from any court 23 in any of those cases that you are in -- always in 24 complete compliance with the federal and state laws 25 including the FCRA and FDCPA. Correct?</p>
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<p>1 section called high standards. You see that? 2 A Yes. 3 Q All right. And I'll read you the first 4 sentence for the record of high standards. It says at 5 ACCB we always work in complete compliance with all 6 state and federal laws including the Fair Debt 7 Collection Practices Act and the Fair Credit Reporting 8 Act. You see that? 9 A Yes. 10 Q All right. Has any court ever made a ruling 11 that said that ACCB always works in complete compliance 12 with all state and federal laws including the Fair Debt 13 Collection Practices Act and Fair Credit Reporting Act? 14 MR. PERR: Object to the form of the 15 question. 16 THE WITNESS: I have no idea what you're 17 asking. 18 BY MR. SOUMILAS: 19 Q Do you base this statement that you are 20 always working in complete compliance based on some 21 ruling that you received from a court in this country 22 that says ACCB you're in complete compliance always? 23 A No. 24 Q Okay. Now, did you ever receive an opinion 25 from an administrative agency of the government such as</p>	<p>1 A Certainly not. 2 Q That is your company's own judgment that it 3 is always in complete compliance. Correct? 4 A Yes. 5 Q Okay. You told me you looked at all of the 6 documents yesterday that your company has with respect 7 to the disputed debt for Mrs. Cammon Dixon-Rollins. 8 Correct? 9 A I certainly tried to go through all of it, 10 yes. 11 Q And would you, after having reviewed what you 12 reviewed, also say that your company was always in 13 complete compliance with state and federal laws 14 including the Fair Debt Collection Practices Act and 15 Fair Credit Reporting Act when it comes to 16 Mrs. Dixon-Rollins? 17 A I'm not aware of any violation. 18 Q Okay. Why don't we go through your file. 19 Let's begin within Dreher 2, sir, which is the document 20 we called the work card. And I believe it begins at the 21 numbers that are labeled ACCB 1. Correct? 22 A Yes. 23 Q You told me that's all part of the work card? 24 A Yes. 25 Q Do you know how much money your company ACCB</p>

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1 was trying to obtain -- to collect on this debt from 2 Mrs. Dixon-Rollins?	1 be a continuation. 2 Q I'm just asking did she have a lease or was she month to month?
3 A 690.	3 A I'm looking to see if there is an attachment for a lease.
4 Q And what was that for?	4 Q Okay.
5 A It would appear to be one month's rent.	5 A There may be one. I saw something here that -- there's the application. Well, there's no attachment showing that there were new leases signed each year. This was a continuation of her first lease taking place back in 2002.
6 Q What month?	6 Q Do you know whether it was a continuation from year to year or from month to month or whether --
7 A Which month?	7 A I assume it's year to year. But I'll be very honest with you, I can't read this.
8 Q Yes.	8 Q So you don't know?
9 A This would have been the last month that was 10 owing. It was my understanding she was evicted.	9 A I'd have to be able to sit down and be a larger print so I could read it.
11 Q Okay. Which month did she not pay rent?	10 Q You would agree with me that the lease that we have at ACCB 4 is a lease from 2002?
12 A I can't tell you for sure. But I'd say it 13 was based upon the end of the lease which is July 31, 14 '05. No, I guess, they -- evidently they didn't charge 15 her for subsequent months after she was evicted in 16 the -- 2004.	11 A As far as -- the only document we have is a lease took out in 2002, yes.
17 Q All right. Would you look at the part of the 18 work card that begins at ACCB 1, please, sir. That's 19 the collections checklist. It appears to reference this 20 rental property, Awbury Park Apartments, unit A16. 21 Correct?	12 Q All right. That's not a lease for any apartment in 2004. Correct?
22 A Yes.	13 A As I say, I can not read everything here to
23 Q You see the lease expiration date they have 24 it as July 31st, 2004?	
25 A Right.	
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1 Q And there's a move out date of June 30th, 2 2004?	1 know exactly what it's saying, but more times not it's a 2 continuation from year to year.
3 A Yes, uh-huh.	3 Q Do you see any continuation from year to 4 year?
4 Q Okay. Is it your understanding that the 5 balance owed of \$690 is for that last month?	5 A 2002 and we're in 2004, so she evidently 6 stayed another year at least.
6 A Based upon this form, yes.	7 Q I think she did.
7 Q Okay. Based on -- the reason why your 8 company tried to collect 690 bucks -- \$690. Excuse me. 9 Is it because you understand that she did not make a 10 payment after she was evicted for the last month of the 11 lease expiring on July 31, 2004?	8 A Two years.
12 A Well, we are missing an itemized statement 13 that brings this from beginning to end on the payments 14 she made, so I can't assume anything, but...	9 Q I'm just wondering whether there's a lease. 10 You have 2004 -- I mean, I'm sorry, a 2002 lease. If 11 you look at ACCB 5. It's a move in date of July 15, 12 2002 and an ending date of July 31, 2003. You see that. 13 Correct?
15 Q I'm not asking you to assume. I'm asking you 16 why your company was trying to collect \$690. For what? 17 You told me she missed a months payment, so if that's 18 the case I want to know which month.	14 A I don't have an answer.
19 A My answer stands. It's the last month based 20 upon what the terms say here on exhibit 0002.	15 Q Okay. If you look at ACCB 5 do you see that, 16 sir, that's a lease that terminates on July 31, 2003 on 17 the right-hand side about midway down on the page it 18 says ending date of lease. Would you like me to point 19 it out to you?
21 Q Okay. So the last month your understanding 22 would be July 2004, sir?	20 A I see it.
23 A Right.	21 Q Okay. And you see that the rent is \$610. 22 Right?
24 Q Was there a lease that she had for 2004?	23 A I don't have all the documents, obviously, here.
25 A She may not have a lease each year. It may	24 Q Well, that's why we spent a good part of the

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1 beginning of this deposition to find out what documents 2 your company have – had. Did your company – 3 A I'm not saying that I have it. I'm not sure 4 we got it from our client. 5 Q Oh, all right. Well, that's what I'm trying 6 to figure out. As far as your work card is concerned 7 you didn't have any document that showed that this lady 8 owed any money in 2004? 9 A Certainly in that the client has given me a 10 statement of security deposit that illustrates they owe 11 690 in unpaid rent -- 12 Q Okay. What does -- 13 A On 0002. 14 Q That's not what it says, sir. That says \$690 15 in liquidated damages. You see that? 16 A Yeah. 17 Q Okay. That doesn't say unpaid rent, you 18 agree with me? No? Where does it say anything about 19 rent? 20 A It does not. 21 Q Okay. Now, where does the 690 figure come 22 from? 23 A Under 0001 the collection check list shows 24 690. 25 Q That says that's the balance owing. That	1 company is collecting when they're trying to collect 2 \$690 from Mrs. Dixon-Rollins? 3 A These two documents I just quoted. 4 Q Okay. You know that Chancellor Properties 5 sends you something that has a balance owed 690. 6 Correct? 7 A Yes, I'm saying two forms say it's 690, yes. 8 Q Okay. So that is what you are trying to 9 collect because that's what Chancellor Property says 690 10 is owed. Correct? 11 A Yes. 12 Q You do not know nor do you have any documents 13 here in this file as to what that 690 actually 14 represents? You don't know that it's rent, you don't 15 know what it is? 16 A That's correct. 17 Q And you don't know that it's owed other than 18 the fact that Chancellor Property says that it's owed? 19 A I believe it's owing. 20 Q You believe it -- that the 690 was owing? 21 A Yes. 22 Q Okay. But you don't have any documents as 23 far as what Chancellor Properties gave you that shows 24 why specifically \$690 would have been owing? 25 A I don't have full documentation, yes.
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1 doesn't say that that's the rent. You would agree with 2 me? The only rent that I see on any lease documents 3 that you have here at ACCB 4 and 5 is a \$610 per month 4 monthly rent. Do you see any other monthly rent? 5 A As I state 0001 shows 690 that's directly 6 from the client. That's what the debtor/consumer owes. 7 The statement of security deposit, 0002, again, 8 liquidated damages was a very common terminology used 9 for left over rent. 10 Q Okay. That very same document you're looking 11 at has a monthly charge of rent of 675 further up. Do 12 you see that? 13 A Yes. 14 Q Okay. Where does the 675 monthly figure come 15 from? Other than the fact that it's on this piece of 16 paper that Chancellor gave you. Is there a lease or is 17 there some continuation to a lease or any other document 18 that shows any monthly rent of 675? 19 A Other than what my client has here that's all 20 I know. 21 Q All right. Your company is collecting 690. 22 Your understanding that 690 is the rent for July 2004 23 after she is legally evicted and leaves? 24 A I don't have the answer. I don't know. 25 Q Okay. Do you know what specifically your	1 Q All right. So your company just assumed that 2 \$690 would have been owing? 3 A Yes. 4 Q And did your company assume that \$690 would 5 have been owing in 2005? 6 A The debt is 2004. I'm sorry. What's 2005? 7 Q Is your company's assumption that that same 8 debt of \$690 would also have been owing in 2005? 9 A Yes. 10 Q And also would have been owing in 2006? 11 A Yes. 12 Q And also would have been owing in 2007? 13 A Yes. 14 Q And also would have been owing in 2008? 15 A Yes. 16 Q And also would have been owing in 2009? 17 A Yes. 18 Q Okay. Now, let's look at the part of the 19 work card which is your company's input of activity in 20 pursuit of this debt. Would you agree with that? 21 A Yes. 22 Q All right. Let's start at the beginning 23 October 4, 2004, what's going on there? 24 A It's just simply saying that was a set-up 25 date on a -- on a new account. They call it a new

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1 Q It might be the case that it's the first time 2 you know anything. But is that what the entry means? 3 That this is a debtor who has some real estate and a 4 current auto loan and, therefore, might have some money 5 to be able to pay this \$690 debt?	1 A I only can assume that I'm talking about. I 2 don't know. It looks as if he agreed to accept some 3 kind of document showing the balance owing. 4 Q What is a SODA? 5 A That is a terminology that's – there's a 6 half a dozen different ones. All about the same thing. 7 They're pretty much an itemized statement. 8 Q Okay. Let's see if I understand this. It 9 says MSD will CB for fax of SODA and will fax DSP LTR. 10 Do you see that?
11 A I can not be sure how to interpret his notes. 12 Q Okay. 13 A But that's what I would assume I said. 14 Q Okay. So you're not sure. Are you -- could 15 you tell me continuing to look at these notes in early 16 2005 when the first time is that, according to ACCB's 17 notes, ACCB actually learns something about Camron 18 Dixon-Rollins and this account?	15 A Yes. 16 Q What does that mean in plain English? 17 A That's referring to sending him an itemized 18 statement. 19 Q Okay. Tell me each one what it means. What 20 does M stand for? 21 A Okay. Are you at 3:43? Where are you 22 quoting from?
22 MR. PERR: I'm just going to object to the 23 form of the question. 24 THE WITNESS: Yeah, learns what? 25 MR. PERR: Learns what? 26 MR. SOUMILAS: I don't know. The way you put it is you don't know anything. 27 BY MR. SOUMILAS: 28 Q Why don't we just move to the entry that is 29 February 28th, 2005 at the very bottom of Bates 7. Do 30 you see that? 31 A Yes. 32 Q Okay. That's a telephone call?	22 MR. PERR: (Indicating). 23 THE WITNESS: Oh, you're still back – you're 24 back up there again. Okay. I went to the next line. 25 He is saying he thought this was resolved in court. Maurice -- M is Maurice -- said will call back for fax number so we can send a SODA or an
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1 A Yes. 2 Q All right. Does it continue on the top of 3 the next page? 4 A Yes. 5 Q Okay. Is the debt collector speaking with 6 somebody named Maurice? 7 A Yes. 8 Q Do you know who Maurice is? 9 A At this time, no. But I know at this time 10 that this was her spouse, I believe, or soon to be a 11 spouse. 12 Q Okay. Is the entry here from February 28th, 13 2005 the first time that your company ACCB gets some 14 message from Maurice that at least he thinks this matter 15 was resolved in court? 16 A Yes. 17 Q All right. Would you agree with me then at 18 least, according to this, to these records, the work 19 card, ACCB now has some reason to think that somebody is 20 disputing this collection account because they think it 21 was resolved in court? 22 A The next entry talks in terms of giving him a 23 SODA and that is an itemized statement. 24 Q Right. But I'm not to the next entry yet. 25 I'm just asking whether the --	1 itemized statement to him. 2 BY MR. SOUMILAS: 3 Q And then it continues M will fax what? 4 A That statement. That SODA. That they're all -- 5 Q DSP LTR doesn't mean dispute letter? 6 A Yes, he's saying at the very last words, will 7 fax dispute letter, yes. 8 Q Okay. Given this entry on February 28th, 9 2005 would you say that this is the first time, 10 according to the work card, that your company knows that 11 there is some dispute about this account and that at 12 least Maurice thought it was resolved in court? 13 A Maurice has no responsibility. We don't know 14 who he even is. It's not even stated that he's a 15 spouse. 16 Q Okay. But your company called Maurice. He 17 didn't call them. Right? 18 A No, it appears that we called the residency 19 and he answered phone. 20 Q All right. You called the residence of the 21 debtor? 22 A Camron Dixon-Rollins. 23 Q Okay. You don't know whether Maurice is the 24 spouse or not?

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1 A I believe I -- at the end looking at the 2 documentation, she married the man, I don't know when 3 that happened. 4 Q Okay. According to your notes, do your 5 collectors know whether Maurice is a spouse to Cammon at 6 this time or he's not? 7 A It's not clarified or documented on the -- on 8 the work card. 9 Q If he's not a spouse, should they -- your 10 collectors be talking to Maurice about Cammon's debt? 11 A No, it probably should not. 12 Q All right. So that would not be in 13 compliance with the Fair Debt Collection Practices Act. 14 Correct? 15 A Yes. 16 Q If they are speaking with Maurice and they 17 don't know Maurice to be the spouse, then they are not 18 always in compliance with the Fair Debt Collection 19 Practices Act. Would you agree with that statement? 20 A Well, on 3/31 it does show spouse Maurice on 21 the entry. So he's not consistent in his notes. I'm 22 sorry. He did, too. He did -- he did show the carry 23 over of February 28th and it does say before his name 24 SPS Maurice. 25 Q This is on February 28th --	1 A Yes. Yes. 2 Q All right. Then we see an entry on the next 3 month March 31, 2005 where the entry is at 8:38 a.m. and 4 there's another call to the residence and they're 5 speaking with Maurice again. Correct? 6 A Yes. 7 Q And Maurice says that they thought that 8 attorney Matthew Litman (sic) was working on this. Do 9 you see that? 10 A Yes. 11 Q Now, when your collectors learn that there's 12 an attorney who is working on a disputed collection 13 account with a consumer is it the practice at your firm 14 to continue dealing with that consumer directly or 15 should they only deal with the attorney who is working 16 on the disputed collection account? 17 A Wait 14 days before you make any contact and 18 instruct the parties to call us directly, the attorney. 19 Q If your firm is satisfied that there is an 20 attorney involved on behalf of a consumer, is it your 21 firm's practice to stop calling the consumer? 22 A They should stop, yes. 23 Q You would agree with me that it's a violation 24 of the Fair Debt Collection Practices Act to continue 25 communicating with a consumer who is represented by an
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1 A Yes. 2 Q -- 2005, sir? 3 A Yes. 4 Q Where does it say SPS Maurice? 5 A Third -- second line. The very end. Talked 6 to, TT, talked to spouse Maurice said... 7 Q All right. So you know that he's the spouse 8 at this point? 9 A He's stating that, yes. 10 Q All right. And he, the spouse, then seems to 11 think, 'cause you're the one who told me we don't know 12 who Maurice is, so we do know who Maurice is, he's the 13 spouse? Your people -- 14 A By the notation, yes. 15 Q Yeah. Your people are calling the residence 16 of Cammon and they're speaking to her spouse? 17 A Yes. 18 Q Okay. So we know as of February 28th, 2005 19 that at least her spouse is saying that this matter was 20 resolved in court and it is in dispute? 21 A Yes, Maurice is stating this was resolved in 22 court, yes. 23 Q This is the first time, according to these 24 notes, that your company is alerted of any problem or 25 any dispute about this account. Correct?	1 attorney in connection with a collection matter? 2 A Yes. 3 Q Okay. So anyways would you agree with me 4 that as of March 31st, 2005 your firm has some 5 understanding that there -- there is a dispute that an 6 attorney Matthew Lietman is working on? 7 MR. PERR: I'm going to object. You're -- 8 BY MR. SOUMILAS: 9 Q Would you agree with that? That this Matthew 10 Lietman is working at least with Maurice in trying to 11 deal with this account? 12 A Maurice is not a responsible party on this 13 debt. 14 Q I hear you. But he's saying there's an 15 attorney that's working on this. That's what the entry 16 says here. Right? I presume this means the debt. Do 17 you think it means something else? 18 A I agree that's what was said. 19 Q Okay. So if an attorney is working on this 20 debt, your company knows that as of March 31st, 2005 and 21 the attorney's name is Matthew Lietman, according to the 22 notes. Correct? 23 A Yes. 24 Q All right. What does the April 4 -- I'm 25 sorry. April 12th, 2005 entry mean when it says EAM

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1 general follow-up good info?	1 A Yes.
2 A I'm unsure.	2 Q All right. So at this point she is saying
3 Q Okay. There's another entry on April 12,	3 she's going to fax a letter.
4 2005 about a letter to 01 proper conclusion. You see	4 A Yes.
5 that?	5 Q Does she, in fact, fax that letter?
6 A What date, please?	6 A Yes.
7 Q April 12, 2005 12:03. Is your company	7 Q And you've alreddy identified that on that
8 sending a letter?	8 exact same date if you look at ACCB Bates 19.
9 A I'm not sure.	9 A Yes.
10 Q Okay. Let's go to April 18, 2005. Is that a	10 Q You told me that this was a fax that came
11 telephone call with Carmon, one of your collectors and	11 from Dix - Carmon Dixon to Eric Allan of your firm and
12 Carmon?	12 it included the April 6, 2005 letter from attorney
13 A This is Carmon calling our office.	13 Matthew Lipman. Correct?
14 Q Okay. And is Carmon saying that she thought	14 A Yes.
15 that this was paid through the court?	15 Q And you told me at least around this time May
16 A Yes.	16 16th, 2005 or so your company would have also received a
17 Q All right. So that's April 18, 2005 where	17 letter otherwise it wouldn't be in the work card?
18 the debtor herself is saying I think this thing is paid	18 A Yes.
19 through a court. Correct?	19 Q All right. So now you know that there's an
20 A Yes.	20 attorney who is working on this file and you know that
21 Q All right. So at this point April, 2005 your	21 it's disputed and at least according to the attorney's
22 company knows that Carmon's husband Maurice is disputing	22 letter it says that it was paid. Correct?
23 this and he thought it was resolved in court. They know	23 A I -- I'd have to go back and find the
24 that there was an attorney Matthew Lietman, supposedly,	24 document.
25 involved in the case and that Carmon herself thought	25 Q Would you take a look at Bates ACCB 14 which
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1 that this was paid through a court. Correct?	1 is a letter from the attorney that she faxes in that day
2 A Yes.	2 May 16th, 2005.
3 Q All right. This is according to your own	3 A Yes. I got it.
4 work card so far. Okay?	4 Q Okay. He says our client agreed to settle
5 A Yeah.	5 this matter and I forwarded a letter dated October 18,
6 Q Let's -- is that correct, sir?	6 2004 confirming same. You see that?
7 A Yes.	7 A Yes.
8 MR. SOUMILAS: Okay. Let's go off the record	8 Q All right. And then he further says in that
9 for a moment to replace the tape.	9 paragraph a review of the docket confirms that this
10 MR. CRUZ: We're off the video record.	10 matter was withdrawn on November 22, 2004. Correct?
11 (Thereupon a recess was taken after which the deposition	11 A Yes.
12 continued as follows.)	12 Q All right. Up to this point has your company
13 MR. CRUZ: We're on the video record.	13 done any type of an investigation to determine whether
14 BY MR. SOUMILAS:	14 this is a debt that has been paid through a court
15 Q All right. So let's continue with this	15 process like Carmon and her husband and her attorney
16 chronology, sir. If we look down to about May 16th,	16 say?
17 2005 an entry at 14:23 military time, you agree with me	17 A I think at this point here there's not been
18 that this is another telephone call by your collection	18 an investigation yet, no.
19 people to the residence of Ms. Carmon Dixon-Rollins?	19 Q Okay. Now, if you look a few entries further
20 A Yes.	20 down May 24, 2005, according to your records, the
21 Q Okay. So they're calling her directly.	21 company received a fax directly from attorney Matthew
22 Correct?	22 Lipman who said do not call anymore or there will be a
23 A Yes.	23 lawsuit. Do you see that?
24 Q All right. And see -- she says she will fax	24 A Yes.
25 a letter from her attorney. You see that?	25 Q All right. So now this is a second letter

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1 from an attorney that your company has a copy of 2 disputing this debt. Correct?	1 where it came from. But it shows the eviction and shows 2 the hearing date and the reschedule date. I don't know 3 if it's here or not, but I know I saw it.
3 A Yes.	4 Q All right. Let -- let's just focus on this
4 Q All right. And let's take a look at that	5 May 23rd, 2005 fax. The fax cover form at Bates ACCB 16
5 letter. I think you've all Eddy identified it	6 says it's page 1 of 4. Do you see that at the top?
6 previously. It was at ACCB Bates 17 and 18, sir.	7 A Yes.
7 A Yes.	8 Q And then there's page 2 of 4 and 3 of 4 are
8 Q All right. And you would agree with me that	9 Mr. Lipman's letter?
9 this letter from attorney Lipman doesn't simply say stop	10 A Yes.
10 calling or else there will be a suit. It says other	11 Q Do you have any reason to believe that
11 things as well that are not part of the work card.	12 Mr. Lipman did not, in fact, include the municipal court
12 Correct?	13 docket on the fourth page even though he says in his
13 A Yes.	14 cover letter that he sent it to you?
14 Q He says that he is enclosing a copy of the	15 A I saw a form. I don't know if this was an
15 municipal court docket that shows that the matter was	16 attachment to this or not.
16 withdrawn with prejudice on November 22, 2004 at two	17 Q Okay. You would agree with me at least that
17 four -- excuse me, 2004, after Ms. Dixon made full and	18 ACCB 17 Mr. Lipman's letter says Ms. Dixon owes no money
18 final payment to Awbury Park. You see that? That's	19 to Awbury Park. That's very clear in the letter?
19 what the letter says?	20 A Yes.
20 A Yes, that's what the letter says, yes.	21 Q Okay. And he clearly says my client has
21 MR. PERR: Without prejudice. You misread	22 advised you continuously that the debt has been paid and
22 that.	23 that no further funds are due. That's pretty clear.
23 THE WITNESS: Yeah, it's without prejudice.	24 Correct?
24 It's not prejudice.	25 A Yes.
25 BY MR. SOUMILAS:	
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1 Q Okay. If I misread it, I apologize. I'll	1 Q Now, we're up to May 24th. I'm sorry. May
2 read it again so that the letter is clear. He's saying	2 23rd, 2005. Does your company conduct an investigation
3 he's enclosing a copy of the municipal court docket	3 at this point to find out whether the funds are really
4 which shows that this matter was withdrawn without	4 due?
5 prejudice on November 22, 2004 after Ms. Dixon made full	5 A It doesn't appear as if we had any additional
6 and final payment to Awbury Park. He says that he's	6 contact after that until we sent a fax to our client
7 enclosing that correct?	7 with a copy of the letter from the attorney on June 7th,
8 A Yes.	8 '05.
9 Q Okay. The fax that your copy -- your company	9 Q All right. Focusing on my question, sir,
10 has a copy of here shows a four-page fax going to your	10 does it appear from your own records and the work card
11 company. Correct? The cover page is ACCB 16 and then	11 that there's any investigation into this dispute that
12 there is two more pages of Mr. Lipman's letter at ACCB	12 ACCB conducts in the late May 2005 time frame?
13 17 and 18. Do you see that?	13 MR. PERR: He just asked and answered.
14 A Yes.	14 THE WITNESS: No, the answer is June 7th.
15 Q Where is the fourth page of the fax?	15 BY MR. SOUMILAS:
16 A I'm sorry. It's not here.	16 Q Your answer is that on June 7th the company
17 Q Okay. At least according to the fax line it	17 conducts an investigation?
18 looks like there were four pages. Correct?	18 A We start the investigation, yes.
19 A I think they had two separate -- these were	19 Q Okay.
20 two separate -- let's see --	20 A We sent information to our client and
21 Q Well, let me try it another way. Do you have	21 attached the attorney letter.
22 any reason to believe that this attorney Lipman did not	22 Q Well, let's not get quite to June 7th just
23 send in the municipal docket with his fax like he said	23 yet. Why don't you look at May 31, 2005 at 8:06 there's
24 he did?	24 an entry from EAM, it says received dispute letter. Is
25 A We have a letter from him. I don't know	25 that what it says?

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<p>1 It just sits there in limbo.</p> <p>2 Q Would you agree with me that at least</p> <p>3 according to documents that you have here in your work</p> <p>4 card you can't tell what the results of the June 7, 2005</p> <p>5 investigation were?</p> <p>6 A I'm -- I'm -- I'm unable to see that, no.</p> <p>7 Q Could you tell what was done as part of the</p> <p>8 investigation other than faxing to Chancellor Properties</p> <p>9 the consumer's dispute letter as well as the letter of</p> <p>10 the consumer's attorney?</p> <p>11 A I'm unable to tell you anything because the</p> <p>12 notes are not there.</p> <p>13 Q Did -- do you know whether Chancellor</p> <p>14 Properties ever received that fax?</p> <p>15 A I have nothing showing here that they did</p> <p>16 anything or responded to us or anything.</p> <p>17 Q Do you know whether they ever -- well, I</p> <p>18 think your report --</p> <p>19 A Well, they did way, way later but...</p> <p>20 Q Well, in connection with that June 7, 2005</p> <p>21 fax that started the investigation do you know whether</p> <p>22 Chancellor responded to your company ACCB with anything?</p> <p>23 A I have no notations, period.</p> <p>24 Q Okay. Let's focus for a moment on August 22,</p> <p>25 2006. And there's an entry from HMH. It says Experian</p>	<p>1 Q All right. Is -- is -- do you know whether</p> <p>2 your company's subscriber code for Experian is what's</p> <p>3 listed as the account number right above that dispute?</p> <p>4 A The only thing I can recognize is the first</p> <p>5 initials and numbers, no.</p> <p>6 Q All right. At any rate you know that</p> <p>7 Experian is communicating with you with a credit bureau</p> <p>8 dispute here on -- in August 2006 and the problem is</p> <p>9 according to Experian this was something that was paid</p> <p>10 and settled prior to being reported to the credit</p> <p>11 bureaus and attorney's notified and there's an</p> <p>12 attorney's name there. Correct?</p> <p>13 A Yes.</p> <p>14 Q All right. You told me that your company</p> <p>15 would investigate these credit bureau disputes as well.</p> <p>16 Correct?</p> <p>17 A Yes.</p> <p>18 Q Who would have been doing the investigation</p> <p>19 in the August 2006 time frame?</p> <p>20 A Either Holly Hare which is initials HMH or</p> <p>21 Kathy Duble. And this shows Holly Hare.</p> <p>22 Q All right. And would you agree with me that</p> <p>23 on the very same date that the -- that the dispute came</p> <p>24 in there's an entry that verified as RPTD?</p> <p>25 A Yes.</p>
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<p>1 DSP. I guess it's dispute.</p> <p>2 A Yes.</p> <p>3 Q All right. Is that the first credit bureau</p> <p>4 dispute that your company has received concerning this</p> <p>5 account for Mrs. Dixon-Rollins?</p> <p>6 A It appears as if it's coming from Experian</p> <p>7 and they're saying that account paid and settled prior</p> <p>8 to being reported to the credit bureau.</p> <p>9 Q All right. Would you please take a look back</p> <p>10 at Dreher 4 which is that group of ACDV documents. Now</p> <p>11 I said -- I know you said you're not familiar with this</p> <p>12 form, sir, but if you look at the top right-hand side</p> <p>13 there's a response date of August 22, 2006. Do you see</p> <p>14 that? A sent --</p> <p>15 MR. PERR: (Indicating.)</p> <p>16 THE WITNESS: Yes, I see it, yes.</p> <p>17 BY MR. SOUMILAS:</p> <p>18 Q Yeah. And there's a description of the</p> <p>19 dispute that says account paid and settled prior to</p> <p>20 being sent to the credit bureau. Attorney notified</p> <p>21 Matthew Lietman it says here. See that under the part</p> <p>22 of the dispute reason?</p> <p>23 MR. PERR: (Indicating.)</p> <p>24 THE WITNESS: Yeah, I see it.</p> <p>25 BY MR. SOUMILAS:</p>	<p>1 MR. PERR: Well, I'm just object to the form</p> <p>2 of the question because you're assuming that the</p> <p>3 date that's listed here is the date that it came</p> <p>4 in. It contradicts the actual --</p> <p>5 MR. SOUMILAS: Well, let's take it one step</p> <p>6 at a time.</p> <p>7 BY MR. SOUMILAS:</p> <p>8 Q Is verified as RPTD, verified as reported?</p> <p>9 A Yes.</p> <p>10 Q Okay. Is that your company ACCB getting back</p> <p>11 to Experian and saying this account is verified as</p> <p>12 accurate?</p> <p>13 A As ver -- as reported, yes.</p> <p>14 Q And Holly Hare is the one who would have done</p> <p>15 the investigation at that time to get back to Experian?</p> <p>16 A That's her initials.</p> <p>17 Q Okay. You agree with me that Holly is also</p> <p>18 the person who entered the dispute on your system?</p> <p>19 She's the one --</p> <p>20 A It would a -- it would appear that way, yes.</p> <p>21 Q Okay. So would you agree with me that if she</p> <p>22 entered it, she was the person responsible for receiving</p> <p>23 it and entering that a dispute has been made?</p> <p>24 A Rephrase it?</p> <p>25 Q Yes. In other words, the fact that her</p>

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1 initials are next to the receipt of the dispute would 2 that mean that it's her job to enter the fact that a 3 credit bureau dispute has been received by ACCB about 4 this account?	1 their own Outlook notes and whatever it is that they do, 2 they should document. Correct? 3 A Yeah, this was done days before. 4 Q Okay. But you told me whatever is done in the investigation is going to make its way on to the work card?
5 A Yes. 6 Q And you told me her job was also to 7 investigate that dispute and get back to Experian. 8 Correct? 9 A Her and Kathy Duble, yes. 10 Q Okay. You agree with me that the entry date 11 for the first notation of this credit bureau dispute is 12 August 22, 2006. Correct? 13 A Yes. 14 Q It's at 12:45 p.m. 15 A Yes. 16 Q The response is on the exact same date at the 17 exact same time in the same minute, you would agree with 18 me on that? 19 A She's filling in the blanks, yes. 20 Q Okay. When you say she's filling in the 21 blanks, what does that mean? 22 A There's just certain options you fill in. 23 Q Are you supposed to do any investigation 24 before you fill-in the blanks? 25 A I'm presuming this is what all was done	12 A Yes. 13 Q You told me that your company takes each case by its own merits and looks as to what it needs to look into in order to get to the bottom of the problem. Correct? 14 A Yes. 15 Q And if you need to speak with somebody or look at certain documents, that they would do it. Correct? 16 A Yes. 17 Q And they would memorialize whatever it is that they did? 18 A Yes. 19 Q Holly memorialized nothing except for the fact that she responded in the exact same minute that she entered the dispute. Correct? 20 A Yes. 21 Q You never spoke with Holly about this case? 22 A No.
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1 before, yes. 2 Q So you are presuming that there was an 3 investigation done. It wasn't just simply received and 4 in the same minute she responded verified as reported. 5 You think that there was an investigation someplace in 6 between? 7 A Yes, there was a big gap. 8 Q Okay. What -- where is that investigation in 9 your records? What was investigated? 10 A The letter from the attorney, the letter from 11 the consumer. 12 Q Where are the entries from Holly that she 13 looked at the letters from the attorney, the letters 14 from the consumer, that she talked to anybody or looked 15 at anything? 16 A She would have the screen right in front of her. 17 Q Is there any entry in your system that Holly 18 did anything like you just mentioned? 19 A No, she did not. No, she did not document this correctly, that's right. 20 Q Okay. She didn't document that she did anything? 21 A Right. 22 Q You told me the investigators would have	1 Q Okay. So you don't know that she did anything? 2 A I only can know she worked for nine, ten years and did a very thorough job. I don't know what happened. 3 Q Fair point. You don't know that she did anything in connection with this Octo -- August 22, 2006 investigation into the Carmon Dixon disputed account? 4 A That's correct. 5 Q Okay. There's absolutely no record that ACCB did anything to investigate this dispute. Correct? 6 A Yes. 7 Q All right. But it did verify to Experian that the account was reported as accurate with a money owing. Correct? 8 A As reported, yes. 9 Q Okay. And at least as far as this line is concerned this doesn't say anything about it being disputed. It just says verified as reported. Correct? 10 A Yes, not adequate report -- notations. 11 Q All right. Now, let's go to what I think is the second credit bureau dispute. And that appears to be May 14, 2007 when Holly handles a Trans Union dispute at ten o'clock that day. Do you see that? 12 A Yes.

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<p>1 Q And at the exact same time on the exact same 2 date she also says verified as reported to Trans Union. 3 Correct?</p> <p>4 A Yes.</p> <p>5 Q All right. Now, is there anything in your 6 records here that Holly actually did anything at all to 7 investigate this Trans Union dispute in May 2007?</p> <p>8 A There's no notations.</p> <p>9 Q Okay. But if she did anything like look at 10 the lease or speak with anybody or look at the attorney 11 letters or determine anything, that should have been 12 there. Correct?</p> <p>13 A Should be notated, yes.</p> <p>14 Q So your company doesn't have any notation or 15 any information that any investigation was conducted. 16 Correct?</p> <p>17 A Yes.</p> <p>18 Q We know that in the exact same minute that 19 the dispute was first entered in your system it was also 20 responded to as being verified as reported to Trans 21 Union. Correct?</p> <p>22 A Yes.</p> <p>23 Q If Holly had spent 18 days investigating this 24 matter ahead of time, we wouldn't know anything about 25 that because there's no record of that?</p>	<p>1 that entry?</p> <p>2 A I'm not sure what that note means. I don't 3 know if Equifax made the decision to delete it. It 4 doesn't clarify that.</p> <p>5 Q Is that an entry --</p> <p>6 A But it's been -- but it was deleted at that 7 time according to what it says.</p> <p>8 Q Is that an entry by Kathy Duble on June 15, 9 2007?</p> <p>10 A Yes.</p> <p>11 Q Okay. Is that the response to the dispute 12 that your company received from Equifax on May 21, 2007?</p> <p>13 A It would appear that way, yes.</p> <p>14 Q Okay. All the previous credit bureau 15 disputes had an entry with a dispute and an entry with a 16 response later. Correct?</p> <p>17 A Yes.</p> <p>18 Q Okay. Why didn't as part of this response 19 your company decide to delete this account with all the 20 bureaus?</p> <p>21 A Rephrase? I'm sorry? What?</p> <p>22 Q Why in connection with this response on June 23 15th, 2007 where the account was deleted as to Equifax 24 didn't your company also delete this same account with 25 Trans Union and Experian?</p>
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<p>1 A Yes.</p> <p>2 Q Now, it looks like Holly is handling a third 3 credit bureau dispute in May of 2007. This is on May 4 21st, 2007 through Equifax. Correct?</p> <p>5 A Yes.</p> <p>6 Q And, again, there's a notation here consumers 7 state this account was paid in full by money order prior 8 to being reported to the creditors. This amount was 9 reached and settled in full before reporting date. Do 10 you see that?</p> <p>11 A Yes.</p> <p>12 Q All right. So is that what Equifax is 13 telling ACCB about this account?</p> <p>14 A Yes.</p> <p>15 Q All right. And you would agree with me that 16 this time somebody else handles this dispute, somebody 17 with the initials KRD. You see that?</p> <p>18 A Yes.</p> <p>19 Q Who is KRD?</p> <p>20 A Kathy Duble.</p> <p>21 Q And on June -- bless you.</p> <p>22 MR. PERR: Thank you.</p> <p>23 BY MR. SOUMILAS:</p> <p>24 Q June 15, 2007 at 11:50 Kathy Duble says to 25 delete it. Correct? Says Equifax deleted. Do you see</p>	<p>1 A I do not know.</p> <p>2 Q Okay. You would agree with me that they did 3 not, in fact, delete it with Trans Union and Experian?</p> <p>4 A It does not appear so.</p> <p>5 Q Because there are more disputes that follow 6 later. Correct?</p> <p>7 A Yes.</p> <p>8 Q Okay. So let's go to what I think is the 9 fourth credit bureau dispute and that appears to be 10 January 8, 2008 from Trans Union at 10:38 a.m. Do you 11 see that, sir?</p> <p>12 A Yes.</p> <p>13 Q Okay. Would you agree with me that that 14 follows the pattern of the previous Trans Union dispute 15 where it's verified as reported in the exact same 16 minute?</p> <p>17 A It does appear that way, yes.</p> <p>18 Q And now there's a new investigator handling 19 this one, it's JCW. Correct?</p> <p>20 A Yes.</p> <p>21 Q And who is that?</p> <p>22 A Judy Walden.</p> <p>23 Q And is she with your company still?</p> <p>24 A No, she was there approximately one year.</p> <p>25 Q Why is she no longer there?</p>

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<p>1 A I don't recall. 2 Q Did she ever complain to you that the work 3 flow for credit bureau disputes was too high for her? 4 A I have no recall. 5 Q Okay. So now we have a fifth credit bureau 6 dispute coming to your firm on January 10, 2008 from 7 Experian. Do you see that? 8 A Yes. 9 Q Would you agree with me that the same pattern 10 is repeated where on the exact same minute of the same 11 day the response is verified as reported. Correct? 12 A Yes. I do not fully understand how the 13 transaction's done. 14 Q All right. With respect to now another 15 dispute I'll call it number six that is coming in on 16 June 23rd, 2008 from the Trans Union Credit Bureau. Do 17 you see that? 18 A Yes. 19 Q And would you agree with me that the pattern 20 is the same that in the exact same minute your company 21 responds that the account should be verified as 22 reported? 23 A Yes. 24 Q Okay. Now with respect to these credit 25 bureau -- by the way, are these all the credit bureau</p>	<p>1 that so I answer it right? 2 Q Well, I mean, I just want to know when your 3 company is receiving these credit bureau disputes does 4 it understand that Mrs. Dixon-Rollins is saying that 5 this account is paid and that it should not be on her 6 credit report? 7 A Yes. 8 Q That -- she un -- you understand that it is a 9 dispute as to the accuracy of the account and that her 10 claim seems to be the same over and over again that it 11 was settled in a court proceeding earlier. Correct? 12 A Yes. 13 Q All right. And with the exception of 14 response to Equifax every time your company responded 15 that the account should be reported -- should be 16 verified on her credit bureau report as it had been 17 reported. Correct? 18 A Yes. 19 Q With a \$690 balance. Correct? 20 A Yes. 21 Q And at least none of the entries that we see 22 in the work card say anything about the account being in 23 dispute status. Correct? 24 A The first time it was disputed we entered it 25 as disputed on all three credit bureaus.</p>
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<p>1 disputes that your company received or did it receive 2 more? 3 A I have no way of knowing. But this is 4 extraordinary to begin with, so I can't imagine, no. 5 Q It's extraordinary in that there are quite a 6 few of them. Correct? 7 A Yes. 8 Q Ms. Dixon is being pretty persistent about 9 this account. Correct? 10 A Yes, but June 27th, 2007 our client told us 11 there was no payments made. 12 Q All right. My question previously, sir, was 13 are these all of the credit bureau disputes that your 14 company received, these six that we just went through? 15 A To the best of my knowledge, yes. 16 Q And it appears that the credit bureau 17 disputes when received are entered in the work card. 18 Correct? 19 A Yes. 20 Q Okay. And there's no doubt that with respect 21 to the credit bureau disputes that your company 22 understood what the dispute was in this case. Correct? 23 A It would appear to be, no. 24 Q Yeah. Okay. It would appear to be what? 25 A It does not, no. Do you want me to rephrase</p>	<p>1 Q I'm asking whether in responding to any of 2 the disputes through the credit bureaus that we just 3 went through, the entries on your work card simply say 4 verified as reported with the exception of the Equifax 5 entry, they do not say anything else. Correct? 6 A Correct. 7 Q All right. Now, when you looked at that more 8 recent work card yesterday you didn't see any more 9 credit bureau disputes? 10 A I don't believe so, no. 11 Q Okay. You're not aware whether -- are you 12 aware that Ms. Eddy's giving a deposition in this case 13 tomorrow? 14 A Yes. 15 Q Do you have any idea why? 16 A Why? 17 Q Yes. Do you have any idea why she's giving a 18 deposition? 19 A I'm really not sure. I was under the 20 impression this was a request because of her initials on 21 somewhere. 22 Q Okay. Do you know whether -- why don't you 23 take a look at the last page of Dreher 4. You see on 24 the bottom right? 25 A Left.</p>

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1 Q I'm sorry. Bottom left hand page there's a 2 authorized signature Dawn Eddy?	1 A I believe we do a very good job in that 2 regard, yes.
3 A Yes.	3 Q And it's supposed to be documented on the 4 work card. Correct?
4 Q Okay. Is it your understanding that when one 5 of your employees responds to a credit bureau dispute, 6 they have to put their name that they're responding to 7 it?	5 A Yes.
8 A I'm not a hundred percent sure of the format, 9 but yes I'm sure there's accountability who they are.	6 Q And the work card with respect to this 7 disputed account for Mrs. Dixon-Rollins does not 8 document that your company did anything with respect to 9 any of these credit bureau disputes. Correct?
10 Q Okay. Looking at the top right-hand side 11 there is a -- some dates as to the -- just says date at 12 the very part and then it says FCRA response date. Do 13 you see that?	10 A I can't say that for sure. You're asking me 11 to assume because I don't know.
14 A Yes.	12 Q Okay. Let's go through all of them again and 13 you tell me where you see that any of your employees did 14 anything to document anything that they did with respect 15 to any of the credit bureau disputes. Take a look at 16 Bates ACCB 8 and 9. They're all memorialized there. 17 And you tell me what they did.
15 Q These dates are from April 2009?	18 A I only can go by what's notated on here.
16 A Yes.	19 Q So could I. Because there are no other 20 documents. So I don't see anything, do you?
17 Q About two months after you had notice that 18 there was a lawsuit concerning this matter. Correct?	21 A As I said, I'm not aware.
19 A Yes.	22 Q Sir, I'm not trying to be tricky here, but we 23 went through every single one of these disputes and 24 there was an entry of the dispute and in the exact same 25 minute a verified as reported response. Did you see
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1 Q Okay. You didn't do anything to -- in 2 preparing for today's deposition to learn about an April 3 2009 dispute after this lawsuit was filed?	1 anything in between as to what was done?
4 A Only aware of the March 23rd I mentioned.	2 A No.
5 Q Okay. The March 23rd was not a dispute. It 6 was a communication you said from Chancellor Properties 7 to your company. Correct?	3 Q Did you see anything before as to what was 4 done?
8 A Yes.	5 A Okay. I will have to have my employee tell 6 you the process of the e -- the credit bureau response 7 system e-OSCAR. I believe I told you and I believe I 8 still feel as if that's a clerical function in those 9 notations that there could be time in between that or 10 before that and they're just fulfilling the fill-in-the 11 spaces part of the e-OSCAR program. I've never seen the 12 system up and running, so my people take the -- as a 13 four -- four-page questionnaire to use e-OSCAR.
9 Q All right. Now focusing for a little longer 10 on these credit bureau disputes that we've seen from 11 August 2006 until -- all the ones you've seen, anyway, 12 would you agree with me that at least according to the 13 work card and the records that your company has in this 14 case there is no entry by any of your employees of any 15 investigation done for any of these disputes?	14 Q Okay. With respect to the Dixon-Rollins 15 disputed account does your company have any notes, any 16 records, any information that it did any investigation 17 with respect to the credit bureau disputes that we just 18 went over?
16 A I'm unsure.	19 A I can only go by what the work card says.
17 Q Are you unsure whether they did anything or 18 not or are you unsure what your records say?	20 Q And the work card says what? What did your 21 company do?
19 A I'm unsure whether everything was documented 20 on to the work card.	22 A Nothing's mentioned about what it did.
21 Q So something could have been done, but not 22 documented on to the work card. Correct?	23 Q Okay. Is -- would you agree with me that as far 24 as the information that you have which you told me 25 was everything as far as this account with

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1 Ms. Dixon-Rollins that in handling the credit bureau 2 disputes nobody from your company ever contacted 3 Mrs. Dixon-Rollins to ask for more information or for 4 any proof of payment? 5 A It would be a standard credit of anybody who 6 says the account is paid to provide proof of payment. 7 Q No. No. No. My question is did your 8 company go back to Mrs. Dixon-Rollins and say would you 9 please provide us some more information so we could 10 conduct our investigation? Is there any proof of a 11 contact with her in connection with any of the credit 12 bureau disputes? 13 A No, I can't say there's any notations saying 14 that. 15 Q Okay. 16 A I only say that I know it's standard 17 procedure for our collectors to ask for proof of 18 payment. 19 Q Okay. But you told me that the collectors 20 handle communications directly with a consumer. 21 Correct? 22 A Yes. 23 Q You told me the credit bureau disputes come 24 in not from the consumer directly, but through the 25 e-OSCAR system and the credit bureaus. Correct?	1 Park Apartments to get some more information about this 2 matter? 3 A Yes, we do know that on or around June 27th 4 our client reported to us that there's no payment been 5 made at that point. 6 Q Okay. Was that in connection with one of the 7 credit bureau investigations? 8 A It doesn't coin – coincide directly by date, 9 no. 10 Q Okay. Well, let's focus on the credit bureau 11 investigations for now. We'll go back to any other 12 investigation. With respect to the credit bureau 13 investigations is there any information or any notation 14 that your company ever went back to Chancellor and asked 15 for more information? 16 A There's no notation. 17 Q With respect to the credit bureau 18 investigations did your company go to any person and ask 19 for more information about this account? 20 A There's no notation. 21 Q Is there any notation or information that 22 your company did some research to find some lease 23 agreement for 2003 or 2004 or at least a continuation of 24 a lease into 2004? 25 A There's no notation to that effect, no.
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1 A Disputes come to us through a collector, 2 through a support person, a support person can do a 3 e-OSCAR response. 4 Q These disputes that we saw coming into your 5 company from Equifax, Trans Union and Experian, you told 6 me they come in through the bureaus. Correct? 7 A The notations I saw would appear to be a 8 credit reporting entities inquiring, yes. 9 Q My question is with investigating any of 10 those disputes did your company ever go back to 11 Mrs. Dixon-Rollins and say we need some more information 12 from you in order to get to the bottom of this? 13 A It's not notated. 14 Q Is there any evidence or any notation or any 15 information that anyone from your company ever went to 16 Maurice her husband to ask for more information? 17 A No, we would never do that. He's not a 18 responsible party. 19 Q Is there any evidence or any information that 20 anyone from your company ever went back to the attorney 21 Matthew Lipman to get some more information about this 22 matter? 23 A It's not notated, no. 24 Q Is there any notation or any information that 25 anyone from your company ever went directly to Awbury	1 Q Okay. Is there any notation that your 2 company went back to the Philadelphia municipal court 3 record that Mr. Lipman said he had airEddy sent, but it 4 wasn't in the work card, to try to get that municipal 5 court record itself? 6 A There was no notation. 7 Q Is there any notation that your company ever 8 investigated for any documents of canceled checks or 9 paid checks or any checks that show any payment on this 10 lease or any missed payment that may have been on any 11 lease for Mrs. Carmon Dixon-Rollins? 12 A Yes, each time we would have spoken to her we 13 would have asked for proof of payment. 14 Q Every time you would have spoken with whom? 15 A Carmon. 16 Q You told me that in handling credit bureau 17 disputes that your practice is that you would never 18 speak with Carmon Dixon-Rollins. 19 A Then I made some inaccurate statements 'cause 20 I have no idea why I would say that. 21 Q Okay. So you're saying every time a credit 22 bureau dispute came into ACCB through say Experian or 23 Equifax or Trans Union someone would call up Carmon and 24 say, hey, Carmon we need some information about this 25 matter to investigate it?

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1 A Had we done that, no. 2 Q You've never done that. Correct? 3 A On this case here, it does not look like 4 that, no. 5 Q Okay. But you do it in other cases? 6 A I believe we do. 7 Q Okay. So in the typical credit bureau 8 dispute cases you would call up the consumer and say, 9 you know, give us some more information of a payment 10 here so we could get to the bottom of this? 11 A Yes. 12 Q Okay. As far as records again are concerned 13 is there any indication or any information that your 14 company researched this money order that was referenced 15 in some of the letters that the -- that the payment was 16 made by money order? 17 A We were not aware as to who the proper entity 18 was that issued the money order. 19 Q There was some reference that there was a -- 20 some settlement out of court. Did your company ever 21 search for the settlement records as to whether there is 22 some settlement that an amount was paid? 23 A I believe we would rely upon the debtor to do 24 that. She's the one who made the payment. She never 25 stepped forward. Never gave us a copy of anything.	1 credit bureaus through 2009? 2 A Yes. 3 Q Okay. Now, with respect to this June 7th, 4 2005 investigation that seems to have been prompted 5 after the calls and the faxes and the letters, did your 6 company ever get to the bottom of whether Mrs. Carmon 7 Dixon-Rollins owes that \$690? 8 A The only notation I have is that June 2007 9 where the client reported to us that the payment -- 10 there was no payment made. 11 Q Forgive me. But you told me that there was a 12 June 7, 2005 investigation initiated by a manager at 13 your company. Correct? 14 A Yes. 15 Q Okay. In connection with that June 2005 16 investigation did ACCB ever get to the bottom of whether 17 she owed the \$690? 18 A As previously stated there's nothing 19 notated -- excuse me. Nothing notated. 20 Q Okay. Are you saying that whatever happened 21 in 2007 was in connection with that investigation that 22 started in 2005? 23 A I can not tell you that, no. 24 Q All right. And do you know why there is a 25 communication in 2007 in June of 2007 between Chancellor
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1 Q Okay. So she never gave you a copy of 2 anything, but did your employees -- or, so you say she 3 never gave you a copy of anything. Your employees in 4 conducting their own investigations did they go and on 5 their own try to investigate what happened out of court 6 and whether there was some type of a settlement and 7 whether it was memorialized someplace? 8 A Well, the court documents -- I don't know. 9 I'm not an expert in the court system in Pennsylvania to 10 know how the system works in that, but it's just as easy 11 for the client to give us proof of payment than to try 12 to figure it all out. 13 Q Sir, isn't it true that with respect to the 14 credit bureau disputes there is not any information or 15 any notation in any of your records that anybody at your 16 company spoke to a single person or looked at a single 17 document in conducting an investigation? 18 A There's nothing notated on the work card. 19 Q What's notated is that they got back to the 20 bureaus and said the account is verified as reported 21 repeatedly except that one time when they told Equifax 22 to delete it. Correct? 23 A Yes. 24 Q And only Equifax to delete it, not the other 25 credit bureaus because it remained there with the other	1 Properties and ACCB? What prompts it in? 2 A There is nothing notated here as to how this 3 came about other than that they reported no payment on 4 June 27th, 2007. 5 Q Would you infer from that entry that there 6 must have been another dispute sometime in the June 2007 7 time frame otherwise there would have been no reason to 8 look into the matter further? 9 MR. PERR: Objection, calls for 10 speculation. 11 THE WITNESS: I would not know. 12 BY MR. SOUMILAS: 13 Q Okay. Why is anybody looking into this 14 disputed account in June of 2007 at ACCB? 15 A I can't tell you. I don't know. 16 Q Okay. But for whatever reason there is 17 another review, if you will, and Chancellor tells you 18 what? 19 A On June 27, 2007 Kathy Duble notated on the 20 file that the client reported there was no payment made. 21 Q So the client is Chancellor? 22 A Yes. 23 Q Okay. And other than Kathy -- 24 A There's a fax in here supporting it. 25 Q Okay. And is that the document ACCB 20, sir.

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1 that we've looked at earlier?	1 advice.
2 A Yes.	2 MR. SOUMILAS: No, I don't. I think she has
3 Q Okay. So the support that ACCB has for	3 been an absentee and you snooze you lose. That's
4 concluding that the amount is still owed as of June 2007	4 the way I see it.
5 is this one-page fax from Charlene Halicki to Kathy	5 MR. LUCKMAN: Go ahead.
6 Duble who you told me was your administrative assistant.	6 MR. SOUMILAS: Yeah, and I would win that
7 Correct?	7 argument with this judge ten of ten times.
8 A Yes.	8 Okay. Let's go on the record. Were we on
9 Q Okay. Nothing else besides the one -- the	9 the record this whole time? Fine. It's been more
10 one-page fax?	10 than ten minutes since the last question. I have
11 A That's everything that's been attached to the	11 no further questions. We've conferred and I think
12 work card, yes.	12 Mr. Luckman has no questions, Mr. Perr has no
13 Q Given the number of disputes that you said	13 questions. We've been trying to find counsel for
14 are rather high in this case into this account, do you	14 Chancellor Properties who is not on the telephone
15 think it would have been a good idea for someone to give	15 and has not called back and Mr. Luckman also sent
16 it a closer look and say, you know, this one-page fax	16 an e-mail to her telling her that we're closing off
17 may not be enough. Let's get some more information out	17 this record and as of this time we still have not
18 of Chancellor to determine whether this thing is owed?	18 heard anything from her, so I'm prepared to close
19 A As to that response, I don't know what else I	19 this record unless anybody else who's actually
20 could ask the client to do.	20 present has any questions.
21 Q Okay. So the one page that's at ACCB 20 that	21 Okay. Not hearing anything, we're done.
22 says, hi, Kathy, I do not have any record of Carmon	22 STIPULATIONS
23 Dixon's account being paid in full. The balance we have	23 IT WAS STIPULATED BETWEEN counsel for the
24 for her is \$690. That's good enough?	24 respective parties, with the consent of the witness,
25 A That's the way -- that's our established	25 that reading and signing of the foregoing deposition by
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1 policy, yes.	1 the witness be waived.
2 Q Okay. So this was handled according to	2 EREUPON, the deposition of TOM DREHER, taken
3 established policy at ACCB. This account here for	3 at the instance of MR. SOUMILAS concluded.
4 Mrs. Dixon-Rollins was not a deviation. Correct?	4 NOTE: The original and one copy of the
5 Sometime somebody drops the ball or somebody --	5 foregoing deposition will be held by MR. SOUMILAS; copy
6 sometimes a computer error is made. That's not this	6 to MR. PERR.
7 case. This was handled according to policy. Is that	7
8 your testimony?	8
9 A I believe it is, yes.	9
10 MR. SOUMILAS: Okay. I don't know if I have	10
11 any more questions, sir, but let's take a	11
12 two-minute break so I can take a look at my notes	12
13 and I think we're done.	13
14 MR. CRUZ: We're off the video record.	14
15 (Thereupon a recess was taken after which the deposition	15
16 continued as follows:)	16
17 MR. SOUMILAS: We are going to go on the	17
18 record and close this record off. I would	18
19 appreciate it, if you could read the e-mail that	19
20 you sent her. Okay?	20
21 MR. LUCKMAN: Yeah. Do you want to give her	21
22 a couple minutes?	22
23 MR. SOUMILAS: You want to give her more?	23
24 MR. LUCKMAN: Not my deposition. I don't	24
25 care what you do. I was just giving you some legal	25

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